

BARRY I. SIEGEL

ATTORNEY AT LAW

BARRY I. SIEGEL+
+ N.J. & N.Y. BARS

631 EAST PALISADE AVENUE
ENGLEWOOD CLIFFS, N.J. 07632
(201) 569-6989
FAX (201) 894-1530

NEW YORK OFFICE
3000 MARCUS AVENUE
SUITE 1E9
FAX (201) 894-1530
LAKE SUCCESS, NEW YORK 11042
(877) 324-7549

February 11, 2015

Honorable Roanne L. Mann
United States Court House
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Alayev v. Shimonov, et.als.
Case No. 13-cv-06490

Dear Judge Mann:

On behalf of Michael Aizin, Esq., attorney for plaintiff, Edward D. Bortz, Esq., attorney for defendants, Konstantin Leviev, The Leviev Development, LLC, and The Leviev Group, LLC, and myself, attorney for defendants, Roman Shimonov, RomanLevy Group, LLC, and RLG Consulting, LLC, we jointly request an extension of discovery and an adjournment of the settlement conference scheduled for September 20, 2015.

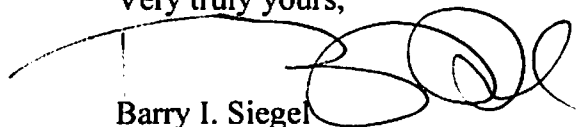
The deposition of plaintiff was completed today. However, due to the fact that plaintiff speaks Russian and an interpreter was necessary, his deposition took all day. We were able to just begin the deposition of Mr. Leviev. As for Mr. Shiminov, whose deposition remains to be completed, he has been out of the country. Therefore, with the Court's permission, we would like an extension on discovery to complete both defendant's depositions.

With regard to the settlement conference, I am leaving on a vacation to Argentina on February 13 and will be back in the office on February 27. I have a trial scheduled in State Court in New Jersey for March 24, so I will be available anytime between those dates to complete the depositions and for a rescheduled settlement conference.

Thank you for your kind consideration of this request.

Very truly yours,

Barry I. Siegel

A handwritten signature in black ink, appearing to be "Barry I. Siegel", written over a horizontal line.

Michael Aizin

Michael Aizin

A handwritten signature in blue ink, consisting of a stylized 'E' followed by 'D. Bortz'.

Edward D. Bortz